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September 28, 2012

Memorandum

To: Regional Director, U.S. Fish and Wildlife Service, Midwest Region
Attention: Rick Amidon

From: Regional Director, Midwest Region

Subject: Review of the Midwest Wind Energy Multi-Species Habitat
Conservation Plan

The National Park Service (NPS), Midwest Regional Office and the Biological Resource Management Division, has prepared comments on the Multi-Species Habitat Conservation Plan (MSHCP). As stewards of public lands, the NPS protects wildlife species through a variety of internal programs, but also strives to be an active conservation partner with other Federal and non-Federal agencies and organizations that act toward the conservation of species and their habitats. While NPS areas currently harbor spatially important refugia that encourage resiliency, many species transit NPS areas during migration or everyday activity, and external developments and processes can thus threaten park resources within and outside of park boundaries. Wind energy developments near NPS lands or located in migratory fly-ways or other migration routes are of particular interest to the NPS, and pursuance of rigorous science and informed planning is critical to conservation of the resources we are mandated to preserve through the Organic Act of 1916. While the NPS supports the development of alternative energies, we believe that it can and should be done in the environmentally least impactful methods.

Attached are two documents. The first, Parks in MSHCP, is a spreadsheet with NPS units on one axis, the species proposed in the MSHCP on the other, with the species status in the park given. We have included NPS units in States that are neighboring the MSHCP for the simple reason that species easily transverse one State to another. A case in point is represented by the second document, MYSO_AlKurta_MACA. It is from Mammoth Cave National Park in Kentucky. In 2004, an Indiana bat (*Myotis sodalis*) was banded near Novell, Michigan, and was recaptured on 3 different occasions (2005, 2007, 2011) in Mammoth Cave National Park.

Of the species listed for inclusion in the MSHCP, only the interior least tern (*Sternula antillarum athalassos*) is not recorded in any park units within the eight States listed in the MSHCP or in park units in neighboring States (please see attached list). Of particular concern to the NPS is the general lack of knowledge regarding the foraging areas and migration routes of the various bat species proposed to be covered by the MSHCP. We find it difficult to protect NPS resources from impacts occurring outside of parks

given this general paucity of information. With this in mind, part of the environmental impact assessment process to define which areas are covered by the MSHCP needs to include studies to define foraging areas and migration routes of the species included in the MSHCP. Knowing these studies could take years to conduct, the MSHCP should include adaptive management strategies to take advantage of new information as it becomes available.

Please contact Biological Technician Dave Trevino, Biological Resources Management Division, at 1201 Oakridge Drive, Suite 200, Fort Collins, Colorado 80525, or at 970-267-2143, if you have any questions about these comments.

-s- Michael T. Reynolds

Attachments 2 (See attached file: MYSO_AlKurta_MACA.xls)(See attached file: Parks in MSHCP.xlsx)

Sent via e-mail by _Nick Chevance_____

date _____ MYSO_AlKurta_MACA.xls



Parks in MSHCP.xlsx



Mammoth Cave National Park Band Recaptures

Species	Band Type	Band No.	Sex	Age at Banding	Date Banded	Location Banded	Date Recaptured	Rep.	Location Recaptured	Recaptured by
<i>M. sodalis</i>	EMU YPSI MI	7479	F	A	27-May-04	near Norvell, MI (Jackson County)	3-Feb-05	NR	Colossal Cave (Edmonson County, Kentucky)	Traci Hemberger
<i>M. sodalis</i>	EMU YPSI MI	7479	F	A	27-May-04	near Norvell, MI (Jackson County)	24-Jan-07	NR	Colossal Cave (Edmonson County, Kentucky)	Bob Currie
<i>M. sodalis</i>	EMU YPSI MI	7479	F	A	5/27/2004	near Norvell, MI (Jackson County)	8-Feb-11	NR	Colossal Cave (Edmonson County, Kentucky)	Steve Thomas

Notes
Bat hibernating in a cluster of M. sodalis in large passage room. Banded during Dr. Al Kurta's research.
Bat hibernating in a cluster of M. sodalis in side passage room on left. Banded during Dr. Al Kurta's research.
Bat hibernating in a cluster of M. sodalis in large passage room. Banded during Dr. Al Kurta's research.

Midwest Wind Energy MSHCP

National Park Service units within the Midwest Energy MSHCP

	<i>Myotis sodalis</i> Indiana bat	<i>M. grisescens</i> gray bat	<i>M. lucifugus</i> little brown bat	<i>M. septentrionalis</i> northern long eared	<i>M. leibii</i> small-footed	piping plover	interior least tern	Kirtland's warbler	bald eagle
Apostle Islands, WI	xx	xx	Present	Present	xx	Present	xx	xx	Present
Cuyahoga Valley, OH	Present	xx	Present	Present	xx	xx	xx	xx	Present
Effigy Mounds, IA	xx	xx	Probably	xx	xx	xx	xx	xx	Present
Grand Portage, MN	xx	xx	Present	Present	xx	xx	xx	xx	Present
Herbert Hoover, IA	False rpt	xx	Present	Probably	xx	xx	xx	xx	Probably
Hopewell Culture, OH	Probably	xx	Present	Present	unconfirm	xx	xx	Probably	Present
Indiana Dunes, IN	Present	xx	Present	Present	xx	Present	xx	Present	Present
Isle Royale, MI	xx	xx	Present	Present	xx	xx	xx	False rpt	Present
Keweenaw, MI	xx	xx	xx	xx	xx	xx	xx	xx	Present
Lincoln Boyhood, IN	Probably	xx	Probably	Probably	xx	xx	xx	xx	Present
Mississippi River, MN	xx	xx	Present	Present	xx	Present	xx	xx	Present
Ozark NSR, MO	Present	Present	xx	xx	xx	xx	xx	xx	Present
Pipestone, MN	xx	xx	Probably	xx	xx	Probably	xx	xx	Probably
Pictured Rocks, MI	xx	xx	xx	Present	xx	Present	xx	xx	Present
Saint Croix Riverway, WI	xx	xx	Present	Unconfirm	xx	unconfirm	xx	Unconfirm	Present
Sleeping Bear Dunes, MI	xx	xx	Present	Present	xx	Present	xx	xx	Present
Voyageurs, MN	xx	xx	Present	Present	xx	False rpt o	xx	xx	Present
Wilson Creek, MO	xx	Present	xx	xx	xx	xx	xx	xx	xx